

1 UNITED STATES DISTRICT COURT  
2 FOR THE NORTHERN DISTRICT OF GEORGIA  
3 ATLANTA DIVISION  
4

5 Civil Action No. 1:17-cv-02989-AT  
6

7 \_\_\_\_\_  
8 DONNA CURLING, et al.,

9 Plaintiffs,

10 vs.

11 BRAD RAFFENSPERGER, et al.,

12 Defendants.  
13 \_\_\_\_\_

14 VIDEOTAPED DEPOSITION OF DEAN M. FELICETTI

15 DATE: September 2, 2022

16 TIME: 9:12 a.m. to 4:28 p.m.

17 LOCATION: Witness location  
18

19 REPORTED BY: Felicia A. Newland, CSR

20 Veritext Legal Solutions

1250 Eye Street, N.W., Suite 350

21 Washington, D.C. 20005  
22

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P R O C E E D I N G S

\* \* \* \* \*

VIDEOGRAPHER: Today's date is  
September 2, 2022, and we are on the record at  
9:12 a.m. This will be the videotaped 30(b)(6)  
deposition of SullivanStrickler, LLC, given by Dean  
Michael Felicetti.

Would counsel present please  
identify themselves for the record.

MR. CROSS: David Cross,  
Morrison & Foerster for the Curling Plaintiffs.  
And with me is my colleague, Adam Sparks.

MR. BROWN: Bruce Brown for the  
Coalition Plaintiffs.

MR. COLEMAN: Eric Coleman on behalf  
of SullivanStrickler.

MS. CLARK-PALMER: Amanda  
Clark-Palmer on behalf of SullivanStrickler.

MR. RUSSO: Vincent Russo, Robbins  
Firm, on behalf of the State Defendants.

MS. LAROSS: Diane LaRoss from Taylor  
English, also on behalf of the State Defendants.

1 VIDEOGRAPHER: Thank you.

2 Will the court reporter please  
3 swear in our witness?

4 \* \* \* \* \*

5 Whereupon,

6 DEAN MICHAEL FELICETTI

7 was called as a witness and, having been first duly  
8 sworn, was examined and testified as follows:

9 EXAMINATION BY COUNSEL FOR CURLING PLAINTIFFS

10 BY MR. CROSS:

11 Q Good morning.

12 A Good morning.

13 Q Can you state your -- oh, grab your  
14 mic.

15 A Oh, my bad.

16 Q That's all right. I did the same  
17 thing.

18 MS. CLARK-PALMER: Do you want it on  
19 your lapel or the tie?

20 MR. CROSS: The tie is probably best.  
21 Are you getting him okay?

22 THE WITNESS: Am I good?

1 BY MR. CROSS:

2 Q Good morning.

3 A Hi.

4 Q Can you just state your full name and  
5 address?

6 A Sure. Dean Michael Felicetti,  
7 56 Ocean Ridge Drive, in Charlestown, Rhode Island.

8 Q So you are not local?

9 A No.

10 Q Okay.

11 A No.

12 Q And you're employed by the  
13 SullivanStrickler firm?

14 A Yes.

15 Q Have you been there since 2017?

16 A No.

17 Q How long have you been there?

18 A Two years August.

19 Q Okay. Where were you before that?

20 A I was a partner in a company called  
21 the Oliver Group.

22 Q And what are your responsibilities at

1 A Oh --

2 Q -- the secrets of the casino.

3 A Of course. Of course.

4 Q Was that your first job out of  
5 college?

6 A First career job, yes.

7 Q Okay. And did you graduate -- you  
8 got your associates degree, you said, in '92?

9 A It was.

10 Q And you also coach basketball?

11 A I do. I'm a high school basketball  
12 coach, going on 13, 14 years now, I think.

13 Q Nice.

14 A I love it.

15 Q Okay. So do you understand that

16 you're testifying today on behalf of

17 SullivanStrickler as a corporate representative?

18 A Yes, sir.

19 Q And just yes or no; has -- has -- I  
20 assume someone has explained to you what that  
21 means?

22 A Yes.



1 A Okay.

2 Q -- so only tell me what you know.

3 A I appreciate that.

4 Q You know, in natural conversation, we  
5 assume things all the time, but I'm not looking for  
6 that today.

7 A Excellent.

8 Q Okay. You said in addition to -- oh,  
9 so we're talking about the documents.

10 Are there any other documents --  
11 well, sorry, let me take a step back.

12 Is there anything else you can tell  
13 me about the documents that you reviewed in  
14 preparation for today?

15 We talked about the photos. We  
16 talked about reports. What else?

17 A No.

18 Q Okay. Is there anything that you're  
19 aware of that was produced to us by Mr. Maggio that  
20 you did not review in preparation for today?

21 A No.

22 Q You said you also spoke with team

1 members. Who did you speak with for today's  
2 deposition?

3 A I spoke with the team members that  
4 were on-site at Coffee County, Georgia.

5 Q And who were those people?

6 A Jim Nelson, Paul Maggio, Jennifer  
7 Jackson, and Karuna Naik.

8 Q And Naik, is that N-A-I-K?

9 A Yeah.

10 Q And Karuna is K-A-R-U-N-A?

11 A Yeah.

12 Q Okay.

13 A Good job.

14 Q You obviously coach kids, you just  
15 gave me a gold star.

16 A Yes, that's it.

17 Q All right. So if we can walk through  
18 each of those. Who is Jim Nelson?

19 A Jim Nelson is a IT/technical expert  
20 that works for SullivanStrickler.

21 Q What is his role?

22 A His role in the company?

1 Q Yes, sir.

2 A He handles data migration, data  
3 collection, converting legacy data, back-up tape  
4 data, historical data, taking data that may be  
5 inaccessible for review. I guess that's the wrong  
6 term, but to look at it natively or to be able to  
7 look at these files, he'll take some historic data  
8 that may be a challenge to convert and put it into  
9 a format that is reviewable, whether that's IT,  
10 information.gov, forensics, et cetera.

11 Q Do you know just generally how long  
12 he's been at the firm?

13 A No.

14 Q All right. Do you know generally  
15 what his education and experience are?

16 A Experience, I knew he worked at a  
17 company called eMag, which was not unlike the  
18 company SullivanStrickler. So it was a very  
19 similar company dealing with data and IT services.  
20 Other than that, I don't -- I don't know what  
21 his . . .

22 Q All right. Let me hand you what's

1       been marked as Exhibit 2.

2               A       Sure.

3               (Felicetti Deposition Exhibit Number 2  
4       marked for identification.)

5       BY MR. CROSS:

6               Q       Who is this?

7               A       That is Jim Nelson.

8               Q       Okay. Is this the Jim Nelson we were  
9       just talking about who's at SullivanStrickler,  
10      right?

11              A       Yes, sir.

12              Q       Okay. Thank you.

13                      What was -- well, actually I'll come  
14      back to that. Never mind.

15                      You also mentioned Jennifer Jackson.

16      Who is she?

17              A       She is the CRO at SullivanStrickler,  
18      chief relationship officer.

19              Q       And what is her role?

20              A       Relations with our clients with  
21      regards to communication, updates, marketing, as  
22      well as project management. That's it that I can

1 think of.

2 Q Does she have any computer science  
3 background?

4 A She's technical. She has an  
5 e-Discovery background, so I guess by virtue of  
6 that, yes.

7 Q Do you know about how long she's been  
8 at the firm?

9 A No.

10 (Felicetti Deposition Exhibit Number 3  
11 marked for identification.)

12 BY MR. CROSS:

13 Q All right. Let me hand you  
14 Exhibit 3. Who is that?

15 A Jennifer Jackson.

16 Q Is this the Jennifer Jackson that  
17 we've been talking about at your firm?

18 A Yes, sir.

19 Q All right. You mentioned Karuna  
20 Naik.

21 A Yes.

22 Q Who is she?

1 Is it Nike or Nik [pronounced  
2 phonetically]?

3 A I'm sorry. Now I put you on the  
4 spot. Some people call her Nik. I call her Naik  
5 [pronounced phonetically], so can we call her Naik  
6 for this?

7 Q Sure.

8 A It's just easier for me.

9 Q Okay.

10 A She is a forensic expert, recently  
11 promoted to our director of forensics.

12 Q When you say "forensic expert," what  
13 does that mean?

14 A She provides the level of forensic  
15 collection expertise that allows her the ability to  
16 provide defensible forensic collection of data.

17 Q When you say --

18 A Does that help?

19 Q Yes.

20 And when you say "defensible forensic  
21 collection," what does that mean?

22 A There are ways to collect data in

1 which you keep metadata intact or data intact  
2 without leaving a footprint. And obviously that's  
3 what we do, and that's -- she is an expert at that,  
4 as well as she is now managing the team, or as her  
5 promotion, handling other experts.

6 Q When you say "collecting data without  
7 leaving a footprint," what does that mean?

8 A When you are asked to image the data  
9 by a law firm, the goal is to obviously not leave a  
10 footprint, like modifying timestamps, date stamps,  
11 that you touched the data, that you altered the  
12 data, et cetera. So you collect it in a way in  
13 which the metadata, the data around the data, both  
14 external and internal, remains intact.

15 So does that answer your question?

16 Q Yes.

17 And is sort of part of the idea that  
18 you're collecting the data in a way that one does  
19 not alter the data; and, two, sort of doesn't leave  
20 traces behind on the original equipment that the  
21 data had been touched or copied or accessed?

22 A Yes. A pristine copy, or a

1 preservation copy it's also referred to as.

2 Q Okay. And that's among the services  
3 that SullivanStrickler provides?

4 A Yeah. Yes.

5 Q And was that among the services that  
6 were engaged for Coffee County?

7 A Yes.

8 Q Is there a difference between  
9 Ms. Naik's training expertise and Mr. Nelson's?

10 A Yes.

11 Q In what way?

12 A Different technologies warrant  
13 different skill sets with regards to collections of  
14 data.

15 Q And let me show you Exhibit 4.

16 (Felicetti Deposition Exhibit Number 4  
17 marked for identification.)

18 BY MR. CROSS:

19 Q Who is this?

20 A This is Karuna Naik of  
21 SullivanStrickler.

22 Q Okay.



1                   A        She's the best. No, she's the best  
2       to work with.

3                   Q        And then last, you mentioned Paul  
4       Maggio. What is his role at the firm?

5                   A        He is the chief operating officer of  
6       the firm.

7                   Q        And what does he do as the chief  
8       operating officer?

9                   A        Provides technical services from  
10      forensic collections to e-Discovery services, as  
11      well as the overall day-to-day operations of the  
12      organization.

13                  Q        Does he have forensic expertise in  
14      the way that you described for Ms. Naik?

15                  A        He has forensic expertise of  
16      different technologies.

17                  Q        All right. Let me hand you  
18      Exhibit 5.

19                  A        Sure.

20                           (Felicetti Deposition Exhibit Number 5  
21                           marked for identification.)

22

1 BY MR. CROSS:

2 Q Who is this?

3 A Paul Maggio, the COO of  
4 SullivanStrickler.

5 Q Okay. Thank you.

6 A You're welcome.

7 Q Were there -- was there anyone else  
8 at SullivanStrickler that was part of or supported  
9 the team that did the work for Coffee County?

10 A No.

11 Q Is there someone at SullivanStrickler  
12 named Greg Freemyer?

13 A Yes.

14 Q And what is his role at the firm?

15 A He provides forensic services. He  
16 was previously the director of forensic services,  
17 but now Karuna is. He is in charge of R&D.

18 Q And did he have any involvement with  
19 the team that did the work in Coffee County?

20 A I don't know.

21 Q Do you know each of these people,  
22 Mr. Nelson, Mr. Maggio, Ms. Jackson, and Ms. Naik,

1 personally?

2 A Personally, how? Personally versus  
3 virtually?

4 Q Fair enough.

5 Have you met them personally?

6 A Yes.

7 Q Have you worked with them on  
8 projects?

9 A Yes.

10 Q With respect to the services that  
11 were provided for Coffee County, now I'd like to  
12 drill down a little more and just understand what  
13 the role was for each of them on that specific  
14 team.

15 A Of course.

16 Q So if we can go back and we'll start  
17 with Paul Maggio. What was his role with respect  
18 to those services?

19 A Paul Maggio was team lead and was in  
20 charge of the forensic collection of the polling  
21 pads. And he was our main point of contact  
22 on-site/project manager, the lead.

1 Q And when you say he was responsible  
2 for the forensic collection of poll pads, what does  
3 that mean?

4 A Each on-site expert, because of skill  
5 set, focuses on certain areas, buckets of data. So  
6 that was his, for lack of a better term, buckets of  
7 data to forensically collect.

8 Q Meaning Mr. Maggio was personally  
9 responsible for collecting the data off of the  
10 electronic poll pads in the Coffee County office?

11 A Yes.

12 Q Was there anything else that he was  
13 responsible for the forensic collection of in that  
14 office?

15 A No.

16 Q And you said he was the lead. Did he  
17 otherwise have responsibility for generally  
18 overseeing the work of the team?

19 A Yes.

20 Q What was Mr. Nelson's role on that  
21 team?

22 A He collected the -- collected -- he

1 imaged the EMS server.

2 Q When you say "imaged the EMS server,"  
3 what does that mean?

4 A Forensically imaged, created a  
5 forensic image of the drives in the server.

6 Q Is this what we talked about before  
7 capturing what you said is a pristine image?

8 A Yes.

9 Q Was there anything else he was  
10 responsible for collecting in Coffee County?

11 A No.

12 Q Did he have any other  
13 responsibilities on this --

14 A Can I go back to that question?

15 Q Sure.

16 A Is that okay?

17 There may have been a hard drive.

18 Q In the --

19 A Do you mind if I look at my notes?

20 Q Sure.

21 A Okay.

22 Oh, yeah. He also collected thumb

1 drives and hard drives. Sorry about that.

2 Q That's okay.

3 The notes you're looking at, are  
4 those notes you took when you spoke to these  
5 individuals to help prepare for today?

6 A Yes.

7 Q Okay. The thumb drives that  
8 Mr. Nelson talked about, what can you tell me about  
9 those?

10 A I don't know.

11 Q Those were thumb drives that were  
12 found in the Coffee County election office, and --  
13 and he was responsible for collecting data off of  
14 those?

15 A Those specific thumb drives, yes.

16 Q Were there other thumb drives that  
17 someone else was responsible for?

18 A Yes.

19 Q Okay. Got it. We'll come back to  
20 that.

21 A Sure.

22 Q Do you have an understanding of what

1 was collected off the thumb drives that Mr. Nelson  
2 collected from?

3 A I do not.

4 Q Was there anything -- what can you  
5 tell me about those thumb drives?

6 A They were -- as I understand it, they  
7 were -- there was a large repository of thumb  
8 drives that was -- the imaging was facilitated by  
9 somebody else. And these particular thumb drives  
10 were tied into the EMS server, the election  
11 management server. And I don't -- unfortunately, I  
12 don't have any other details other than that.

13 Q The ones that Mr. Nelson imaged were,  
14 to your understanding, thumb drives that were used  
15 with the EMS server?

16 Just when you say "tied into," what  
17 do you mean?

18 A I don't know. I don't know, no.

19 Q And then you said Mr. Nelson also was  
20 responsible for imaging hard drives. What can you  
21 tell me about that?

22 A As I understand it, there was one

1       hard drive that failed during imaging. The hard  
2       drive didn't fail, the image creation failed, let  
3       me rephrase that. And so it was given to Jim to  
4       take a look at. So it was an image.

5               Q       Just one?

6               A       Yeah. As I understand, it was one.

7               Q       Okay. What can you tell me about  
8       that hard drive in terms of what was on it, what it  
9       was used for?

10              A       I don't know.

11              Q       Okay. Do you know whether he was  
12      able to get the data off of it?

13              A       I do. He was able to image it.

14              Q       Are we talking about just a  
15      standalone hard drive or a hard drive inside of  
16      another device?

17              A       It -- I don't know.

18              Q       Do you have any information about  
19      what that hard drive was used for in the office?

20              A       I do not know.

21              Q       Any information on the type of data  
22      that was on it?



1 A I do not know.

2 Q Okay. You said there was another set  
3 of thumb drives that were imaged by someone else.  
4 Who was that?

5 A Karuna.

6 Q Okay. What were those thumb drives  
7 used for?

8 A Those thumb drives were a collection  
9 of -- let me think. Can I look at my notes again?

10 Q Uh-huh.

11 A Sorry. This is a lot.  
12 Thumb drives. (Witness reading from  
13 document.) I do not know.

14 Q These thumb drives, or thumb drives,  
15 were in the elections office?

16 A Yes. Yes, sir.

17 Q And to your understanding, they were  
18 used with the election equipment?

19 A Yes, sir.

20 Q So to take a step back, what was  
21 Ms. Naik's role on the team?

22 A Forensic imaging.

1 Q What all did she have responsibility  
2 for forensic imaging in addition to the thumb  
3 drives?

4 A SD cards, CompactFlash cards.

5 Q Is there a difference between an SD  
6 card and a CompactFlash card?

7 A CompactFlash cards.

8 Q Okay. Basically the same thing?

9 A Yeah.

10 Q What was on the CompactFlash cards  
11 that she imaged?

12 A I believe it was the -- hold on one  
13 sec. I should know this. Can we come back to  
14 that?

15 Q Sure.

16 A So maybe it'll --

17 THE WITNESS: Is that all right with  
18 you guys?

19 MR. COLEMAN: That's up to you.

20 THE WITNESS: It should --

21 BY MR. CROSS:

22 Q It's okay.

1 A -- but right now I don't know.

2 Q Okay. So she imaged CompactFlash  
3 drives and thumb drives. Anything else in the  
4 office?

5 A No. That was it.

6 Q Did she have any other  
7 responsibilities on that team?

8 A Those were her primary  
9 responsibilities. I guess -- no, that would be it.

10 Q That takes us to Jennifer Jackson.  
11 What was her role?

12 A Documentation, chain of custody.

13 Q What do you mean by "chain of  
14 custody"?

15 A So for each piece of -- each target  
16 piece of media that was imaged, we tagged with a  
17 code, an identifier, take a picture, and log for  
18 chain of custody. So we have a -- a means of which  
19 to track everything that was going to be collected.

20 Q Why is chain of custody important  
21 with data and devices like this?

22 A The chain of custody is required,

1 one, for the ability obviously to track when data  
2 is handed to a third party for imaging, to identify  
3 the fact that we are in ownership of that  
4 particular piece of media for a certain length of  
5 time. And it's used for tracking, logging  
6 historical information, et cetera. So we can track  
7 back where a particular drive was imaged from, who  
8 the -- what's your -- what it was labeled as, any  
9 other identifiers.

10 It's also used as a means to  
11 physically check media for any damage, any --  
12 anything that looks out of place. So you're in a  
13 position to look at something and say, "Well, you  
14 know, before we move forward with this, please note  
15 that, I don't know, it looks like it failed," or  
16 something like that. But it's another means in  
17 which to -- to track information, not only the  
18 physical state of it, but just the documentation to  
19 track it all the way back.

20 Q Is maintaining chain of custody with  
21 respect to computer equipment and data, is that  
22 generally considered a best practice?

1 analysis, at that point you're now digging deeper  
2 into the things that you would be talking about,  
3 last access, modified, et cetera, et cetera, but  
4 chain of custody wouldn't get you that.

5 Q I see. In that situation, okay.

6 When your firm is engaged to access  
7 computer equipment, is it important to -- to  
8 maintain the chain of custody in terms of from  
9 start to finish who had access to that equipment,  
10 what was done with it, all the way through the end  
11 of the point at which the project ends?

12 A Yes.

13 Q Okay. Why is that important?

14 A Taking ownership of -- of devices  
15 becomes the responsibility of the forensic company  
16 that's handling the work. At which point, the  
17 ability to hand it back and have a means to track  
18 that is tracking that chain of custody, and it's  
19 vital.

20 Q Did SullivanStrickler carefully track  
21 the chain of custody with respect to the Coffee  
22 County project?

1 A Yes, sir.

2 Q And to your understanding, did it  
3 comply with firm policy and best practices?

4 A Yes, sir.

5 Q It sounds like Ms. Jackson was one of  
6 the people responsible for that. Is that right?

7 A Yes, sir.

8 Q Was anyone else -- did anyone else  
9 have responsibility with respect to the chain of  
10 custody?

11 A No. No.

12 Q You said she was responsible for  
13 documentation. What do you mean?

14 A Logging. As part of the chain of  
15 custody, logging a code that we identify a piece of  
16 media as, as well as any physical labels that may  
17 be on a device or a hard drive, and our internal  
18 code that we use for tracking.

19 Does that help?

20 Q Yes.

21 A Okay.

22 Q But just -- I understand what you

1 mean, but for the record, explain what you mean  
2 when you say "internal code for tracking."

3 A So SullivanStrickler utilizes a  
4 project code, an internal code, that we reference  
5 not only in chain of custody, but in the  
6 communications back and forth as a means for  
7 tracking and consistency.

8 Q Does every project get assigned an  
9 internal code?

10 A Yes, sir.

11 Q And one was assigned here, right?

12 A Yes, sir.

13 Q Do you recall was the code here  
14 SSA1722?

15 A I can't tell you right now, but I'm  
16 going to check.

17 Yes, sir.

18 Q Okay. What other responsibilities  
19 did Ms. Jackson have, if any, on this team?

20 A I -- I don't know aside from chain of  
21 custody.

22 Q Who took the photos that were

1 produced?

2 A Jennifer Jackson.

3 Q Is that part of her responsibility in  
4 terms of documenting the work?

5 A Yes, sir.

6 Q So taking those photos, is that a --  
7 is that a part of your standard procedures for this  
8 type of project?

9 A It is a normal procedure.

10 Q Do you know whether anyone involved  
11 with the work, including people in Coffee County's  
12 office, did anyone object to the photos?

13 A I don't know.

14 Q Sorry, I may have asked you before.  
15 Is there anyone else who had any responsibility  
16 either on or supporting the Coffee County team  
17 beyond these four individuals?

18 A No.

19 Q How did the firm select the team  
20 members for the Coffee County project?

21 A Based on experience, capabilities.

22 Q Who generally makes the decision on



1 who is assigned to a project like this?

2 A Paul Maggio.

3 Q So in the general course, Paul Maggio  
4 would have selected the people for this team?

5 A Yes.

6 Q Do you know whether employees at the  
7 firm have the option to opt out of a project if  
8 they are asked to work on it?

9 A They do.

10 Q Do you know whether anyone was asked  
11 to work on the Coffee County project and declined?

12 A I do not know.

13 Q Okay. Who would you ask if you  
14 wanted to know?

15 A Paul Maggio.

16 Q Do you know whether anyone, whether  
17 on the team or otherwise, at SullivanStrickler  
18 expressed any concerns about taking on this work?

19 A I don't know.

20 Q Do you know whether anyone expressed  
21 any concerns at all about working on the team?

22 A I don't know.

1 Q Who engaged SullivanStrickler to do  
2 the work in Coffee County?

3 A Jim --

4 Q Penrose?

5 A Yes, Jim Penrose and Doug Logan.

6 Q When did they first reach out to  
7 SullivanStrickler for the work, approximately?

8 A Early January for Coffee County.

9 Q What's the basis for that testimony?

10 A Can you repeat the question?

11 Q Sure.

12 What's -- what's the basis for your  
13 understanding that Mr. Penrose and Mr. Logan  
14 reached out to the firm, specifically for Coffee  
15 County, in early January?

16 A By virtue of requests for other  
17 services outside of Coffee County. The request  
18 came in that pointed to Coffee County, I believe,  
19 in early January.

20 Q Okay. And just so I understand, for  
21 that testimony, are you relying on documents you  
22 looked at or people you spoke with or both?

1 Q -- you've got a stack of documents  
2 with you.

3 A Yes.

4 Q What do you have with you?

5 A I have the production stack.

6 Q On any of the documents that you have  
7 with you, do you have notes on any of those  
8 documents?

9 A I do not.

10 Q Okay. I didn't know if it would be  
11 helpful for you to look at them.

12 A No.

13 Q All right. So do you recognize  
14 Exhibit 6?

15 A I do.

16 Q Is this an engagement agreement for  
17 forensic analysis of the SullivanStrickler firm?

18 A Yes, sir. Excuse me.

19 Q Do you need some water?

20 A I'm good.

21 Q Okay.

22 A Thanks.

1 Q And this engagement agreement is with  
2 Jesse Binnall of the Harvey & Binnall firm. Is  
3 that right?

4 A Yes, sir.

5 Q And it's dated November 30, 2020?

6 A Yes, sir.

7 Q Is this engagement agreement, does it  
8 reflect the standard agreement and the standard  
9 terms that SullivanStrickler uses?

10 A Yes, sir.

11 Q Does SullivanStrickler have different  
12 types of standard agreements depending on the type  
13 of project it's doing or does it have a standard  
14 agreement sort of across the board?

15 A The agreement is standard aside from  
16 if there was different services being provided. So  
17 aside from forensic work, there may be back-up tape  
18 recovery work, something like that. Mostly the  
19 format on all the agreements or the template that  
20 we use are as here.

21 Q Okay. So the SullivanStrickler firm  
22 has a standard agreement it uses for all its

1 SullivanStrickler has a license to?

2 A Yes, sir.

3 Q Was Relativity ultimately used with  
4 respect to the Coffee County work?

5 A I don't know. I would say no based  
6 on we didn't host anything in Relativity, so the  
7 short answer is no.

8 Q Okay. To the best of your knowledge,  
9 nothing was -- none of the data copied from Coffee  
10 County was loaded into a Relativity platform?

11 A Correct.

12 Q And then the next bullet, "Storage.  
13 Devices may be stored at the Vault for the  
14 following fees:"

15 Do you see that?

16 A Oh, yes, sir.

17 Q What's "the vault"?

18 A We -- our building is a vault. It's  
19 an old accounting facility that was owned by a  
20 bank. So we securely manage and vault physical  
21 media and data.

22 Q So literally like an old bank vault?

1 A Yes, it is.

2 Q Like a big steel door?

3 A It's very cool.

4 Q Okay.

5 A It's very cool. You're welcome to a  
6 tour when this is all done.

7 Q Was any of the Coffee County data --

8 A Strike that you're welcome to a tour  
9 thing. My bad. Oops. I'm trying my best here,  
10 give me some slack.

11 Q Yeah, you're doing fine.

12 A Okay, thanks.

13 Q You're doing fine.

14 Was the Coffee County data ultimately  
15 stored in the vault for any period?

16 A Yes, sir.

17 Q Is there data from Coffee County  
18 still stored in the vault?

19 A Yes, sir.

20 Q Was that data ever stored outside of  
21 the vault?

22 A No, sir.

1 Q And that data was ultimately uploaded  
2 to a file share site on the internet?

3 A Yes, sir.

4 Q Okay. Do you know why with the  
5 Binnall Agreement, there's a lot more detail and  
6 what looks to be a lot broader scope of work  
7 anticipated for Georgia than there was for Nevada?

8 A I do not.

9 Q If you wanted to know the answer to  
10 that, who would you ask?

11 A Paul Maggio.

12 Q You said earlier that your  
13 understanding from talking to Mr. Maggio was that  
14 the firm was first engaged to do work in Georgia in  
15 early January 2021, but we have an agreement with  
16 Mr. Binnall from November 30 that anticipates a  
17 pretty broad scope of Georgia work.

18 Do you know -- can you explain that  
19 to me?

20 A Sure. As I understand it, the -- and  
21 I don't know anything really other than Coffee  
22 County, so I don't know what was done in Nevada,

1 Q With respect to Coffee County in  
2 particular, did the firm get what it believed were  
3 assurances from Coffee County election officials  
4 that it was allowed to do the work that it was  
5 doing?

6 A Assurance in that they pointed out  
7 what needed to be imaged and identified what we  
8 were to be collecting, yes.

9 Q And by "they," you're talking about  
10 Coffee County election officials who were  
11 on-site --

12 A People that were on-site, correct.  
13 Yes, sir.

14 Q On-site in the elections office  
15 during the copying?

16 A Yes, sir.

17 Q And it was the understanding of  
18 SullivanStrickler that at least some of those  
19 individuals giving that direction were election  
20 officials for Coffee County?

21 A Yes, sir.

22 Q Is it your understanding now, with



1 discussions with Mr. Maggio and others?

2 A Yes.

3 Q The work that was done in Coffee  
4 County, was that done -- was the customer for that  
5 work Sidney Powell?

6 A Sidney Powell paid the bills.

7 Q What's your understanding of who the  
8 customer was for the purpose of the engagement  
9 agreement for the Coffee County work?

10 A Sidney Powell. Very good.

11 Q So is it SullivanStrickler's  
12 understanding still today that Sidney Powell had  
13 all of the necessary legal rights and permissions  
14 for the work that she engaged SullivanStrickler to  
15 do in Coffee County?

16 A Yes, sir.

17 Q What is the basis for that  
18 understanding?

19 A Borrowed license at the time -- no,  
20 see, I don't -- I don't know.

21 Q That's okay.

22 A Yeah, sorry.

1 Okay. So let's look at 7. I'm going  
2 to hand you Exhibit 7.

3 (Felicetti Deposition Exhibit Number 7  
4 marked for identification.)

5 BY MR. CROSS:

6 Q And do you recognize this as an  
7 engagement agreement for forensic analysis where  
8 Sidney Powell retained the firm?

9 A Yes, sir.

10 Q And this is dated December 6, 2020.  
11 Is that right?

12 A Yes, sir.

13 Q So this is about a week after the  
14 engagement with Mr. Binnall that was November 30,  
15 2020, right?

16 A Yes, sir.

17 Q And if you look on the first page of  
18 the agreement, there's a -- it looks like an  
19 eSignature by Sidney Powell. Do you see that?

20 A Yes, sir.

21 Q There doesn't look to be a signature  
22 by Mr. Maggio, but is it -- was this engagement

1 tabulate the votes in the state of Michigan.

2 Do you see that?

3 A Yes, sir.

4 Q So do I understand correctly that  
5 this agreement with Ms. Powell was signed with  
6 respect to forensic collection and analytics work  
7 that was anticipated in Michigan?

8 A Yes, sir.

9 Q All right. How did it come to be  
10 that the work done in Coffee County was done for  
11 Ms. Powell instead of Mr. Binnall?

12 A As I understand it, the focus  
13 shifted, I don't want to say from Michigan, but  
14 maybe after Michigan, to Coffee County. And I  
15 don't know why there are two different engagements,  
16 one specifically for Jesse Binnall, versus this  
17 one.

18 Q Okay. SullivanStrickler performed  
19 forensic collection of data pursuant to the Binnall  
20 agreement, right, in some jurisdiction?

21 A I don't know. I don't know what  
22 happened in Nevada.

1                   Q       Okay. Is it your understanding that  
2       the Binnall Agreement ended up being for work only  
3       that would have occurred in Nevada?

4                   A       Yes, sir.

5                   Q       And so any work that was done in  
6       Michigan and Georgia was done pursuant to the  
7       Powell Agreement?

8                   A       Yes, sir.

9                   Q       All right. You can put that aside  
10      for the moment.

11                  A       Okay.

12                  Q       I'll have some more questions in a  
13      minute.

14                            To kind of help with the context  
15      here, let me hand you Exhibit 8.

16                  A       Sorry.

17                            (Felicetti Deposition Exhibit Number 8  
18      marked for identification.)

19      BY MR. CROSS:

20                  Q       All right. So Exhibit 8, this is an  
21      e-mail thread between individuals at  
22      SullivanStrickler, Ms. Powell, and a variety of

1 other folks that relate to, at least in part, the  
2 work that was done in Coffee County.

3 Do you see that?

4 A Yes, sir.

5 Q Is this a document that you've seen  
6 before today?

7 A I've seen this before.

8 Q So is this one of the things that  
9 you -- you reviewed in preparing for the  
10 deposition?

11 A Yes, sir.

12 Q All right. If you look at the last  
13 page of the e-mail, there's an attachment, a  
14 SullivanStrickler invoice. You can flip all the  
15 way to the back.

16 A Yep.

17 Q Is this in the form of a standard  
18 invoice for forensic work?

19 A Yes, sir.

20 Q And if you look here, it's sent to  
21 Sidney Powell, Defending the Republic. Do you see  
22 that?

1 Doug Logan" -- there's a cell number -- "will be  
2 joining you and flying out there with you."

3 Do you see that?

4 A Yes, sir.

5 Q So do I understand correctly that  
6 when the work was first contemplated for  
7 SullivanStrickler to access voting equipment, that  
8 first came at the direction of Jim Penrose and Doug  
9 Logan?

10 A Yes, sir.

11 Q And did -- did they remain key points  
12 of contact throughout the work that was done by the  
13 firm with respect to copying election equipment?

14 A Yes, sir.

15 Q Including Coffee County?

16 A Yes, sir.

17 Q Okay. And then it goes on. "Your  
18 POC on the ground Nevada is Todd from our team."

19 Do you know who Todd is?

20 A I do not.

21 Q And then below, do you see where it  
22 says, "Todd, the SullivanStrickler POC for the

1 Q So do you understand that Tricia is  
2 someone who works with Ms. Powell?

3 A Yes, sir.

4 Q Okay. Do you know who she is?

5 A I do not.

6 Q All right. And here now on  
7 January 7th in the morning, the subject line of  
8 the -- even though we're still on the same e-mail  
9 thread, the subject line now refers to "Coffee  
10 County, Georgia Forensics Engagement Agreement."

11 Do you see that?

12 A Yes, sir.

13 Q So the project number SSA1722 is  
14 still the same project number that we have down in  
15 the thread referring to Wayne County, Michigan  
16 forensics.

17 Do you see that?

18 A Yes, sir.

19 Q So do I understand correctly that  
20 SullivanStrickler -- the Coffee County work was  
21 part of the same project as Michigan?

22 A Yes, sir.

1 County?

2 A Yes. Yes, sir.

3 Q Okay. Then the afternoon, January 8,  
4 2021, Mr. Maggio sends another update. "Everything  
5 went smoothly yesterday with the Coffee County  
6 Election. Everyone involved was extremely  
7 helpful."

8 Do you see that?

9 A Yes, sir.

10 Q And this e-mail was -- he's  
11 addressing Sidney, right?

12 A Yes, sir.

13 Q When he wrote, "Everyone involved was  
14 extremely helpful," is it your understanding that  
15 included individuals in the Coffee County office  
16 who identified themselves as election officials?

17 A Yes, sir.

18 Q Okay.

19 A Well, the people that were there that  
20 identified themselves as officials, yes, but there  
21 were also people there that we wouldn't know -- I  
22 hate to assume, but they presented themselves as



1 officials, even having an office there and things  
2 like that.

3 Q Understood. And we'll walk through  
4 the photos to identify those folks.

5 He further provides in his report on  
6 the afternoon of January 8, "We are consolidating  
7 all of the data collected and will be unloading it  
8 to our secured site for access by your team.  
9 Hopefully we can take care of payment today."

10 Do you see that?

11 A Yes, sir.

12 Q He's working hard to get paid.

13 A I noticed that. I guess when you  
14 read it, it's --

15 Q No, I respect it.

16 A Thank you.

17 Q We all have clients.

18 And when he indicates, "We're  
19 consolidating all the data collected," what is --  
20 is that a general practice in those type of  
21 engagements?

22 A It is. When there are multiple data

1 Q Okay. Are you familiar with Scott  
2 Hall?

3 A I am.

4 Q How do you know Scott Hall?

5 A Based on discussions with the team  
6 and his involvement in the collections.

7 Q What is your understanding of his  
8 involvement with the collections?

9 A That he was on-site.

10 Q In Coffee County on January 7th --

11 A Yes, sir.

12 Q I'm sorry, let me just make sure I  
13 get the question done.

14 A Yeah. Yeah. I'm sorry.

15 Q No, you're good. It's common.

16 All right. And did you discuss with  
17 Mr. Maggio Mr. Hall's involvement in the Coffee  
18 County project?

19 A Yes, sir.

20 Q What did Mr. Maggio have to say about  
21 Mr. Hall's involvement?

22 A He was a senior --

1 MR. CROSS: Exhibit 9.

2 THE WITNESS: He had a senior role in  
3 oversight, to some extent.

4 BY MR. CROSS:

5 Q So you had said earlier, and we see  
6 in the e-mails, that Jim Penrose and Doug Logan  
7 were principal points of contact for Coffee County,  
8 right?

9 A Yes, sir.

10 Q When did Mr. Hall, Scott Hall, become  
11 involved with the Coffee County project?

12 A I believe -- I don't know. I know he  
13 was there on-site that day.

14 Q Okay.

15 A Anything prior to that, I'm not fully  
16 aware.

17 Q Do you know why he was involved?

18 A I don't.

19 Q All right. Let me hand you what's  
20 been marked as Exhibit 9. And we're looking at  
21 Tab 16.

22

1 (Felicetti Deposition Exhibit Number 9

2 marked for identification.)

3 BY MR. CROSS:

4 Q Is Exhibit 9 one of the documents you  
5 looked at in preparation for today?

6 A Yes, sir.

7 Q This is an e-mail -- sorry, strike  
8 that.

9 This is a text thread between Paul  
10 Maggio and Cathy Latham, right?

11 A Yes, sir.

12 Q And this comes from Paul Maggio's  
13 phone, right?

14 A Yes, sir.

15 Q So the green is from -- are texts  
16 that Mr. Maggio is sending and the black, those are  
17 texts that Ms. Latham is sending, right?

18 A Can you repeat that? I'm sorry.

19 Q Yeah, sorry.

20 Since this came from Paul Maggio's  
21 phone, the green texts are the ones that Mr. Maggio  
22 sends, the black texts are ones that Ms. Latham

1 sends, right?

2 A Yes, sir.

3 Q Okay. So what we see here is on  
4 January 7, 2021 at 11:09 a.m., Ms. Latham sends a  
5 text to Mr. Maggio with an address in Douglas,  
6 Georgia.

7 Do you see that?

8 A Yes, sir.

9 Q Are you aware that that's the address  
10 for the Douglas local airport?

11 A I am not.

12 Q Okay. And then Mr. Maggio responds a  
13 minute later, "Received. We will pick up Scott."  
14 Do you see that?

15 A Yes, sir.

16 Q Did you understand that Scott Hall  
17 flew into the Douglas, Georgia airport on the  
18 morning of January 7 --

19 A Yes, sir.

20 Q -- of 2021?

21 Okay. And so what we see here is  
22 Ms. Latham coordinating with Mr. Maggio on somebody

1 is picking up Scott Hall from the airport, right?

2 A Yes.

3 Q And then another minute later  
4 Mr. Maggio writes back, "Better yet, have Eddie  
5 pick up Scott. Our vehicle is full. We will meet  
6 him there."

7 Do you see that?

8 A Yes, sir.

9 Q Who actually drove the team to  
10 Maggio? Like literally drove the vehicle?

11 A Jim Nelson.

12 Q Do you know what kind of vehicle they  
13 were in?

14 A I know he has a truck.

15 Q Okay. Like a pickup truck?

16 A Yeah. But I don't know if that's  
17 what he drove. And as far as in that truck, there  
18 were three people; so it was Jim, Paul, and  
19 Jennifer.

20 Q And how did Ms. Naik get there?

21 A She had to drive and pick up a  
22 Cellebrite, one of our forensic tools. So she had

1 to go and get it from, I believe, the office and  
2 then meet everyone there.

3 Q So Ms. Naik separately drove to  
4 Douglas?

5 A To -- not to Douglas. Is that where  
6 Coffee County is?

7 Q Yes.

8 A Oh, then yes. Yes. Sorry.

9 Q That's okay.

10 And she drove there alone?

11 A Yes.

12 Q Did she drive back alone?

13 A Yes, sir.

14 Q And the other three rode back in  
15 Mr. Nelson's vehicle?

16 A Yes, sir. Well, I believe his  
17 vehicle. He drove.

18 Q Understood.

19 Okay. Then Ms. Latham writes back to

20 Mr. Maggio at 11:30 a.m., "How far out" -- sorry.

21 She writes back, "How -- how far out are you?"

22 Do you see that?

1 A Yes, sir.

2 Q And Mr. Maggio responds, "We are in  
3 town waiting for Scott to let us know when to pull  
4 in." Do you see that?

5 A Yes, sir.

6 Q Where did the team wait for the green  
7 light from Scott Hall?

8 A I believe the parking lot.

9 Q Of the Coffee County elections  
10 office?

11 A Yes, sir.

12 Q A pen with a light on it?

13 A Oh, it's very cool. I got it  
14 yesterday. I'm sorry. I don't even use it. It  
15 kind of tweaks me out a little, so I want to  
16 apologize.

17 Q Oh, no, that's fine.

18 A I'm sorry.

19 Q Do I understand correctly, the team  
20 was waiting for Mr. Scott Hall to give them  
21 direction that it was time to go into the elections  
22 office?



1 A Yes, sir.

2 Q Do you have any understanding of what  
3 they were waiting for?

4 A Other than Scott being a senior --  
5 sorry, a senior leader on this effort in Coffee  
6 County, no.

7 Q When did the firm first start taking  
8 direction from Scott Hall for Coffee County as  
9 opposed to taking direction directly from Jim  
10 Penrose, Doug Logan or Sidney Powell?

11 A It wasn't as much direction as  
12 general, if you have an issue, you collect  
13 everything type of deal.

14 Q Okay.

15 A Nothing is specific. And that was  
16 provided by the other folks.

17 Q Since the Coffee County was done  
18 pursuant to the engagement with Sidney Powell, was  
19 it the understanding of SullivanStrickler that  
20 Scott Hall was part of that Sidney Powell team, and  
21 that's --

22 A Yes.

1 Q Okay. And what was the basis for  
2 that understanding?

3 A I don't know.

4 Q Okay. And so, again, looking back at  
5 the text between Mr. Maggio and Ms. Latham  
6 coordinating the team's arrival and getting Scott  
7 Hall there, do I understand correctly that  
8 Ms. Latham was also a key point of contact for the  
9 SullivanStrickler team with respect to the Coffee  
10 County work?

11 A Yes, sir.

12 Q So she was one of the primary points  
13 of contact for organizing and facilitating the work  
14 in Coffee County?

15 A Yes, sir.

16 Q Oh, do you know who Eddie is?

17 A I do not.

18 Q Do you know how Scott Hall got from  
19 the airport in Douglas to the Coffee County  
20 elections office?

21 A I do not.

22 Q Do you know if someone traveled with

1 MR. CROSS: Yeah, it's a very, very  
2 large -- yeah.

3 We can go off the record for a  
4 moment.

5 VIDEOGRAPHER: The time is 11:16 a.m.  
6 We are off video record.

7 (Recess from 11:16 a.m. to 11:17 a.m.)

8 VIDEOGRAPHER: The time is 11:17 a.m.  
9 We are back on video record.

10 BY MR. CROSS:

11 Q Before we look at the picture, we  
12 talked earlier that Ms. Latham was one of the  
13 principal points of contact organizing the Coffee  
14 project. Do you recall that?

15 A Yes, sir.

16 Q Ms. Latham was literally the person  
17 who welcomed Mr. Maggio and his team at the  
18 elections office the morning of January 7th, 2021.  
19 Is that right?

20 A Yes, sir.

21 Q And when they arrived, she presented  
22 herself as a Coffee County elections official. Is

1 that right?

2 A Yes, sir.

3 Q If we look at page 33 in Exhibit 10  
4 in the -- the screenshots of the video provided by  
5 Coffee County, you'll see here Mr. Maggio is in the  
6 grey sweater, right?

7 A Uh-huh. Yes, sir.

8 Q And Jim Nelson is next to him in the  
9 khaki pants?

10 A Yes.

11 Q Jennifer Jackson is in front in the  
12 pink jacket?

13 A Yes.

14 Q And do you understand that's Cathy  
15 Latham escorting them into the building?

16 A I don't know.

17 Q Okay. That's fine.

18 Then if we come to the next page, we  
19 see the same woman with grey hair holding the door  
20 open and Mr. Maggio and Mr. Nelson are walking in,  
21 right?

22 A Yes, sir.

1 work?

2 A No.

3 Q And would they have had any reason to  
4 do that?

5 A No, sir.

6 Q Because the firm's understanding at  
7 the time, and still today, is that it had all the  
8 legal rights to do what it was doing?

9 A Yes, sir.

10 Q All right. Let me hand you  
11 Exhibit 12.

12 (Felicetti Deposition Exhibit Number 12  
13 marked for identification.)

14 BY MR. CROSS:

15 Q All right. So take a moment, if you  
16 need, and flip through Exhibit 12.

17 Do you recognize these as photos that  
18 were produced by Mr. Maggio and that were taken by  
19 the team on January 7, 2021 in the elections  
20 office?

21 A Yes, sir.

22 Q Okay. And we talked before earlier

1 that Ms. Jackson, part of her responsibility was to  
2 document the work, including taking photos.

3 Do you recall that?

4 A Yes, sir.

5 Q Did she take these photos?

6 A Yes.

7 Q Is your understanding that she took  
8 all of the photos?

9 A Yes.

10 Q Did anyone else with  
11 SullivanStrickler take any photos or video?

12 A No.

13 Q Okay. Did anyone else in the room --  
14 sorry, strike that.

15 Did anyone else who was on-site in  
16 Coffee County on January 7, 2021 take any photos or  
17 video?

18 A Not that I know of. I don't know.

19 Q Did you discuss that specifically  
20 with any of the team members?

21 A I did.

22 Q And no one on the team was aware of

1 anyone else taking photos or video?

2 A I was directed to Jennifer Jackson  
3 whenever it came to that.

4 Q All right. Is it fair to say the  
5 team's understanding or recollection from the  
6 events was that she was the only one who took  
7 photos and video?

8 A Yes, sir.

9 Q Okay. All right. Let's start with  
10 the first page.

11 A Sure.

12 Q And it's got this little production  
13 number ending in 236. These are pictures of  
14 CompactFlash drives, right?

15 A Yes, sir.

16 Q And each CompactFlash drive has a  
17 little note next to it with the project number  
18 SSA1722, right?

19 A Yes, sir.

20 Q And then below the project number  
21 there's other information. What is the information  
22 that's recorded on each of those notes?

1                   A       The CF number is a tracking code.  
2                   And the -- the word next to it or -- yeah, the word  
3                   to the right of the CF number is the label of the  
4                   machine, the device that was -- that the cards were  
5                   removed from.

6                   Q       Okay. So each of the CompactFlash  
7                   drives, when the team arrived, was installed in a  
8                   device. The team pulled the CompactFlash out of  
9                   the device, copied it. Is that right?

10                  A       No.

11                  Q       Oh, sorry. I'll tell you what, let  
12                  me just ask. Walk me through the steps the team  
13                  took to copy the -- the CompactFlash drives that we  
14                  see in this picture.

15                  A       As I understand it, the CompactFlash  
16                  disks were given to Karuna to image. And I can  
17                  walk you through that process if you want to hear  
18                  it.

19                  Q       We will in a moment.

20                  A       Okay.

21                  Q       Who gave her the CompactFlash?

22                  A       It would have been -- there were a



1           number of people. It would have been either Misty  
2           Hampton -- I would say Misty Hampton, because she  
3           directed, "Grab this, get this, get that, get  
4           this."

5                   Q       Misty Hampton was the elections  
6           supervisor in Coffee County at the time?

7                   A       As I understand it, yes.

8                   Q       Okay. And you anticipated where I  
9           was going to go.

10                   Did anyone beyond Ms. Hampton direct  
11           the SullivanStrickler team what to copy?

12                   A       Yes, I believe so.

13                   Q       What's your understanding about  
14           others who gave direction?

15                   A       Misty directed the larger percent,  
16           but as I understand it, Cathy Latham also provided  
17           direction on what was required for collection. And  
18           Scott Hall had said, "Get -- are you sure you're  
19           getting everything? Are you getting everything?"  
20           So that was interpreted as, "Make sure you get  
21           everything that you can."

22                   Q       Okay. And what was the idea for the

1 SullivanStrickler team? Essentially if there was a  
2 device in the office that had data on it, the  
3 team's task was to extract that data to the extent  
4 they could?

5 A Yes, sir.

6 Q So looking back at the first picture  
7 in Exhibit 12, so let's just take the fourth one  
8 down on the left. So you've got the project number  
9 and then "CF04." And then there's that Braxton-2."  
10 Or what is that word?

11 A It looks -- it does look like Braxton  
12 or Broxton, but that information also would be  
13 tracked in the chain-of-custody log that was  
14 produced.

15 Q And do you see next to that it looks  
16 like there's one that refers to Ambrose?

17 A Yes, sir.

18 Q Do you understand that -- that the  
19 references here on these notes correlate to voting  
20 precincts in Coffee County, or do you know?

21 A I do not. We reference them as just  
22 labeled.

1 server?

2 A Yes.

3 Q And was data captured from those --

4 A I believe it was, yes.

5 Q Using one of these two processes?

6 A Yes, sir.

7 Q The EMS server has a computer

8 attached to it. Do you recall that?

9 A Yes, sir.

10 Q Was the collection for the EMS  
11 server, was it done through the computer attached  
12 to the server or did they connect it directly to  
13 the server itself or both?

14 A So can you -- I'm sorry, can you  
15 repeat the question?

16 Q Sure.

17 So there's two devices associated  
18 with the EMS server. There's the server itself and  
19 then there's a computer that connects to the  
20 server, right?

21 A Yes.

22 Q Okay. Did they image the computer

1 connected to the server?

2 A No. They booted the server up using  
3 a bootable thumb drive that doesn't leave a  
4 footprint and then pushed it off using DFIR  
5 scripts.

6 Q And did they plug the thumb drive  
7 directly into the server?

8 A I believe they did, but I don't know  
9 100 percent.

10 Q Okay.

11 A And that's --

12 Q All right. I referred to an ICP  
13 earlier. I misspoke on what that is.

14 Are you aware that in the  
15 Dominion's -- well, let's back up for a moment.

16 You don't go to Georgia obviously?

17 A I do not.

18 Q You live in Rhode Island?

19 A Yes, sir.

20 Q How do you -- what's the mechanism of  
21 voting in Rhode Island at the polls?

22 Do you write something by hand? Do

1 A Yes, sir.

2 Q Okay. And -- and the -- the  
3 SullivanStrickler team on January 7th copied data  
4 from scanners, too, right?

5 A Yes, sir.

6 Q And that's both the central scanner  
7 that sits in the office and individual scanners  
8 that are used at precincts?

9 A Yes, sir.

10 Q And these ballot-marking devices, the  
11 touchscreens, the team also collected data from  
12 those as well, right?

13 A I believe so. They were the big  
14 touchscreens?

15 Q Yes.

16 A I believe so. And I -- and I -- I  
17 believe so. I think they were running Android or  
18 something, OS on them, but I don't know  
19 specifically how they were collected.

20 Q Okay.

21 MR. CROSS: If we could confirm that  
22 before the deposition is over.

1                   A       That's okay. I don't know why these  
2       are upside down.

3                   Q       245, these are more CompactFlash  
4       drives that the team copied on-site in Coffee  
5       County?

6                   A       Yes, sir.

7                   Q       And then 246 is another picture of  
8       Mr. Nelson and Ms. Naik in the EMS server room  
9       doing the collection?

10                  A       Yes, sir.

11                  Q       247, I think we may have looked at  
12       this earlier. Well, let me -- 247, this is a  
13       picture in the Coffee County election office,  
14       right?

15                  A       Yes, sir.

16                  Q       Do you know -- the computer that's  
17       seen here, do you know if that's a computer that  
18       you guys brought or something that you're  
19       collecting from?

20                  A       It looks like ours.

21                  Q       All right. Just based on the  
22       information that you can see here?

1                   A       Yeah, based on the spreadsheet,  
2       what's in document recovery, based on the task bar,  
3       but I'm not 100 percent certain.

4                   Q       Okay. And you --

5                   A       I could -- it very much -- it looks  
6       like ours now that I'm looking at it. It looks  
7       like a Surface with a keyboard.

8                   Q       Okay. If you look at 248 --

9                   A       Yeah.

10                  Q       -- do you know what this is?

11                  A       Yes, sir. It looks like a USB drive.  
12       I can't really tell. Yes, it looks like a drive.

13                  Q       Like an external hard drive?

14                  A       Yeah.

15                  Q       Okay. And do you see where it's got  
16       the project number and then "EMS 01"?

17                  A       Yes, sir.

18                  Q       The Dell basic warranty, the external  
19       hard drive, does this look like a drive that you  
20       guys brought with you?

21                  A       It does.

22                  Q       And is -- it's my understanding that

1 the EMS 01, that what this indicates is this is the  
2 hard drive that likely contained the data taken  
3 from the EMS -- sorry, copied from the EMS server?

4 A Yes, sir.

5 Q Okay. And then in 249, these are  
6 more CompactFlash drives copied on-site by the  
7 team?

8 A Yes, sir.

9 Q And 250, this is another -- well,  
10 strike that.

11 250, do you see where it's got again  
12 the project number and then "Tabulation 01"? Do  
13 you see that?

14 A Yes, sir.

15 Q And do I understand correctly that  
16 in -- in the picture, in 250, that this is the  
17 central scanner or what's often referred to as the  
18 tabulator in the office?

19 A Based on the label and the  
20 documentation, yes.

21 Q And, again, this is a device that the  
22 team copied the data from?



1 A Yes, sir.

2 Q Okay. If you go to 251, do you know  
3 what this is?

4 A It looks like a router. Yeah, it's a  
5 router, I think. I can't really tell.

6 Q Do you know whether the team  
7 attempted to copy data from a router?

8 A I don't think they did. No, they did  
9 not try to collect data from a router.

10 Q Would you expect there to be data on  
11 a router?

12 A No.

13 Q All right. 252, more CompactFlash  
14 drives that the team copied?

15 A Yeah.

16 Q All of the data that was copied from  
17 Coffee County, that was all copied on-site in the  
18 office?

19 A Yes, sir.

20 Q Okay. So there was never a moment  
21 when someone provided equipment or devices to the  
22 SullivanStrickler team from Coffee County that was

1                   Q       The forensic copying that you guys  
2       did in Coffee County, you were able to take all of  
3       the data that you took without needing passwords to  
4       any devices?

5                   A       That is correct.

6                   Q       And how -- walk me through sort of  
7       how that's possible.

8                   A       When -- passwords that are typically  
9       provided, unless they -- that are on local  
10      machines, or on machines, if they are not  
11      encrypting the actual OS at boot, when it boots,  
12      you can forensically image -- we're only looking at  
13      a source.

14                               So we can look at -- here's an  
15      example:   So if this laptop here had a password on  
16      it, when we attach our device and we boot and we  
17      point to that to collect, it's just looking at a  
18      block of data or the data that's on the disk.   And  
19      also pieces of the disk that may not contain data,  
20      but fragments of data.   So imagine it just  
21      collecting that, whatever's on the disk, then  
22      creating an image of that, and then taking that off

1 with it.

2 Now, if I was looking to do something  
3 targeted where you said to me, you know, "We really  
4 only want these files," without doing a forensic  
5 image, we would require a password to attach to the  
6 machine and then to filter down using Windows tree  
7 viewer or searching or whatever to grab the files.

8 But there's no need -- for the  
9 technologies that were here for us to need any  
10 passwords to gain that -- to forensically image  
11 them.

12 Q And the forensic image captures, if  
13 done correctly, all of the files, all of the data  
14 sitting on the device?

15 A Yes, sir.

16 Q Once the data is pulled off in that  
17 process, is a password needed to then access that  
18 data on whatever device it's copied to?

19 A Yes, sir.

20 Q So the -- the data that is -- that  
21 was taken -- I'll be more precise. The data that  
22 was copied in Coffee County, has anyone at

1 would upload the data to the ShareFile, and then  
2 whomever asked for access or was given access based  
3 on the attorneys, they would say, "All right. We  
4 need access for this, this, and this." We would  
5 create those accounts and then you would be able to  
6 pull the data down.

7 Does that paint a picture?

8 Q Yeah.

9 A Does that --

10 Q Thank you.

11 A You're welcome.

12 Q So for anyone accessing that data and  
13 wanting to actually look at the data itself, look  
14 at the files, they might need a password to the  
15 extent that any particular file is password  
16 protected at the time you collected it?

17 A And they would need a password from  
18 us. So everything that gets put on ShareFile is  
19 password protected. So they -- it would require a  
20 password no matter what to gain access to that  
21 data.

22 Q Okay. When the firm shared the data

1 from Coffee County via the ShareFile, it provided  
2 log-in credentials to the individuals who were  
3 given access to that data, right?

4 A Yes, sir.

5 Q And so the log-in credentials would  
6 be, what, a user name and a password?

7 A Yes.

8 Q And that -- once they logged in, they  
9 then would have access to -- to whatever was  
10 sitting on that ShareFile site for their user  
11 account?

12 A For their account, yes. So -- yes.

13 So permissions based on access to certain areas  
14 within that ShareFile repository. And permissions,  
15 like "Ability to download, yes or no; ability to  
16 upload, yes or no; you know, admin rights, no,"  
17 this -- things like that.

18 Q If a user were to share their log-in  
19 credentials for your ShareFile site with another  
20 individual, you wouldn't have any way of knowing  
21 that, right?

22 A I don't know. I don't think we would

1 A I don't know.

2 Q Okay.

3 All right. And so what we've talked  
4 about on-site, January 7, 2021, the team copied  
5 data from the EMS server, a scanner that sat in  
6 that room, and a computer that works with that  
7 scanner. ICPs, CompactFlash drives used with ICPs,  
8 and the poll pads, some laptops that we saw, and  
9 some number of ICXs, or what are referred to as the  
10 BMDs, the big touchscreens. Is that right?

11 A Yes.

12 Q Is there anything else that you're  
13 aware of the team copied data from on-site that day  
14 that we have not yet talked about?

15 A There was the -- I believe, a hard  
16 drive that I mentioned when we started today  
17 that -- I'm sure it's referenced in the chain, but  
18 I wasn't sure what that was for.

19 Q It was an external hard drive that  
20 was sitting in the office?

21 A Yes, sir.

22 Q And you don't know what -- what was

1 A No, sir.

2 Q How was the decision made to do the  
3 collection in Coffee County specifically?

4 Who made -- who made -- who picked  
5 Coffee County? Was it the client?

6 A The client.

7 Q Did the client -- and are we  
8 talking -- for the client, are we talking about  
9 Jesse Binnall or Sidney Powell or someone else?

10 A Sidney Powell through Jim Penrose and  
11 Doug Logan.

12 Q Okay. Does the firm have any insight  
13 into how they selected Coffee County?

14 A No.

15 Q Are you familiar with an -- an  
16 individual named Ben Cotton?

17 A I've read the name, but that's it.

18 Q Are you aware that Ben Cotton  
19 purports to be a computer science expert who has  
20 testified under oath in a proceeding in Arizona  
21 that he has analyzed the data that your team  
22 collected from Coffee County?

1 break now. You're in the hot seat, you -- you  
2 choose.

3 THE WITNESS: I -- I really don't  
4 care.

5 MR. CROSS: Why don't we do -- why  
6 don't we do one more that kind of relates to what  
7 we were looking at and then we'll --

8 MR. RUSSO: Whatever is fine with me.

9 THE WITNESS: Yeah, that's fine. I  
10 want to kind of get through as much as we can.

11 MR. CROSS: Yeah, typical witness  
12 mentality.

13 MR. COLEMAN: It's his wife's  
14 birthday.

15 BY MR. CROSS:

16 Q All right. Let's look at 14. So I  
17 think you said you did not look at a copy of the  
18 hard drive that was provided to us. Is that right?

19 A Correct.

20 Q Okay. So this is the file structure  
21 taken from our copy of the hard drive that was  
22 provided to us. So you've not seen this before?



1 A I have not.

2 Q Okay. If you just look at the -- the  
3 top where it's got the project number, SSA1722. Do  
4 you see that?

5 A Yes, sir.

6 Q "Hard drive contents," do you see  
7 that?

8 A Yes.

9 Q And then there are these sort of  
10 primary-level folders, "CompactFlash,  
11 Dominion-Supplied Laptop, EMS Server, Miscellaneous  
12 Thumbs, Polling Pads, Reports, Tabulation System."

13 Do you see that?

14 A Yes.

15 Q And would it be standard practice  
16 when this data is collected to create a file  
17 structure like this where you're storing data in  
18 folders that indicate where it came from?

19 A Yes.

20 Q Okay. And so here, it would be  
21 standard practice that, for example, where it says  
22 "CompactFlash" that would be data copied from

1 CompactFlash drives in Coffee County?

2 A Yes.

3 Q Same with "EMS Server," for example?

4 A Yes.

5 Q And then "PW.txt," would that --  
6 would it be standard practice that that would be a  
7 text file that includes any passwords?

8 A Yes.

9 Q Okay.

10 A And then if you look, what we've done  
11 is broken down the file structure beneath those  
12 higher-level --

13 Yeah.

14 Q -- files. And so the standard  
15 practice here would be to create a folder that  
16 corresponds to each device, right?

17 A Yes.

18 Q So under "CompactFlash," for example,  
19 we saw in the pictures there would be a  
20 CompactFlash that has a note that designates it  
21 CF1. The standard practice would be to create a  
22 folder that captures the data in that folder from

1 at, it looked like there was a router sitting on  
2 that table.

3 A Right.

4 Q Do you have any insight into why  
5 there would be a router sitting in that elections  
6 office where the EMS server sits?

7 A I do not.

8 Q Did SullivanStrickler ever access any  
9 of the voting equipment or data in Coffee County  
10 remotely over the internet?

11 A No. Everything was air gapped.

12 Q And when you say "air gapped," you  
13 mean your collection of it was air gapped?

14 A Yes.

15 Q None of the devices you brought with  
16 you were connected to the internet?

17 A That is correct.

18 Q Okay. What was the process -- and  
19 you may have touched on this before, but just to  
20 make sure I understand.

21 What was the process for getting the  
22 data onto your ShareFile site?

1 I know we talked before, you  
2 consolidate the data, then you upload it to the  
3 ShareFile site. That's done physically in the  
4 SullivanStrickler office?

5 A Right. So a copy is made,  
6 consolidated, that we discussed, of all of the  
7 targeted data that was collected. That -- those  
8 drives that were utilized to collect the data are  
9 then preserved with a preservation copy. So you  
10 have a working copy, a preservation copy. The  
11 preservation copy is then -- that data is then  
12 uploaded to the ShareFile.

13 Does that answer your question?

14 Q Yes.

15 A Okay.

16 Q Did SullivanStrickler require anyone  
17 who had -- was given access to the ShareFile for  
18 the Coffee County data to sign any kind of  
19 non-disclosure or any confidentiality agreement?

20 A No. We were working under the  
21 original agreement information.

22 Q So the way it would work is your

1 points of contact, like a Doug Logan or a Jim  
2 Penrose or Sidney Powell, would -- would reach out  
3 to SullivanStrickler and say, "Hey, I want you to  
4 share the Coffee County data with -- with this  
5 individual as well." And then you guys would give  
6 log-in credentials for the ShareFile to that  
7 individual?

8 A That's exactly right.

9 Q Does each individual have their own  
10 log-in credentials for ShareFile?

11 A Yes. And permissions.

12 Q Right.

13 You talked about this before. Each  
14 individual user may have some different  
15 permissions, meaning one user can upload and  
16 download, but another can only download?

17 A Or only have access to certain areas  
18 within ShareFile.

19 Q Are you aware that one or more of the  
20 individuals that you guys gave log-in credentials  
21 to shared their log-in credentials with -- with  
22 other individuals?

1 the client never warned SullivanStrickler that by  
2 capturing data on the poll pads, that they would be  
3 capturing PII for Georgia voters?

4 A Correct.

5 Q Okay. The data that was loaded to  
6 the ShareFile at the direction of the client, did  
7 that include all of the data collected from Fulton  
8 County -- I'm sorry, from Coffee County?

9 A Yes.

10 Q So in addition to Coffee County,  
11 there was a SullivanStrickler team, that included  
12 at least Paul Maggio, that did some copying of  
13 voting data or software in Antrim County, Michigan,  
14 right?

15 A I don't know.

16 Q I'm setting up for a broader question  
17 which is --

18 A Yeah.

19 Q -- what experience does  
20 SullivanStrickler have, prior to Coffee County, in  
21 specifically collecting and preserving data from  
22 voting equipment, if any?

1                   A       Well, voting equipment being a  
2       tablet, laptop, hard drives, servers, an extensive  
3       amount, if we look at it purely from a technology  
4       standpoint.

5                   Q       It's fair to say there was nothing  
6       unusual about the technology that was copied in  
7       Coffee County, that it went beyond the firm's prior  
8       experience and training in terms of doing this type  
9       of forensic collection?

10                  A       That's correct.

11                  Q       So we talked about there's a device,  
12       I think you may have referred to it as the UEFI  
13       device. Do you know what that is?

14                  A       It is the -- it is a collection tool,  
15       yes.

16                  Q       The software that's used on that  
17       collection tool, is that something -- where does  
18       that software come from? Where did it come from?

19                            Like, for example, is that standard  
20       software off the shelf?

21                  A       It's the standard, yeah. And I don't  
22       know where it originated from.

1 Q So it's not software that  
2 SullivanStrickler wrote?

3 A No. No.

4 Q So that's standard off-the-shelf  
5 software that the firm obtains from some source  
6 that it then uses for this type of collection?

7 A Correct.

8 Q And you -- you don't know the source  
9 of that software that you guys use?

10 A I do not.

11 Q Do you know what it's called? Is  
12 there a brand?

13 A I don't know.

14 Q Okay. And can you sort of to the  
15 best of your ability, walk me sort of mechanically  
16 how that device works?

17 The UEFI device, like, how does it  
18 work?

19 A Well, there's -- it's similar to what  
20 we were doing for the -- it's similar to the DFIR  
21 list, where it's bootable, not leaving a footprint  
22 in grabbing data. To the extent of the details



1 around it, I wouldn't know.

2 Q Okay. Why does -- why does some  
3 devices need the UEFI software and others use  
4 the -- like you said, the DFIR, the D-F-I-R,  
5 software?

6 A Source technologies, how data is laid  
7 down on disk, physical disk. Operating system  
8 information, whether a disk -- it's a physical  
9 disk, whether it's logical, whether it's -- there  
10 is a number of things.

11 However, the list of tools that are  
12 utilized by companies like SullivanStrickler are  
13 pretty standard amongst all of us, but it would be  
14 the technology. So Cellebrite for iPads, X-Rays  
15 for mobile phones. Just for -- as an example,  
16 there are multiple softwares that are used  
17 specifically in our industry for certain  
18 technologies.

19 Q Is it fair to say that the  
20 Cellebrite, the DFIR, the UEFI, those all serve  
21 essentially the same purpose, but they're designed  
22 to be used with different technology?

1 Q Yeah.

2 A I do not believe so.

3 Q And were -- I may have asked you  
4 this, but just to be clear, were any of the  
5 devices, anything at all that SullivanStrickler  
6 brought in and they connected to any equipment in  
7 the Coffee County office, were any of those devices  
8 connected to the internet at any point during the  
9 collection?

10 A They were not.

11 Q And all of the devices that you guys  
12 used to collect data, none of those devices has  
13 ever been directly connected to the internet?

14 A I don't even know if that's accurate.

15 Q Okay. You just don't know?

16 A Yeah, I don't -- I don't know.

17 Q At some point, the data was  
18 consolidated and uploaded to ShareFile?

19 A Correct.

20 Q And so at some point, there was a --  
21 a SullivanStrickler device that had the data that  
22 was connected to the internet to load it to the

1           ShareFile site?

2                   A           Yes.

3                   Q           Okay.

4                   A           Which is encrypted in transmission as  
5           well.

6                               MS. CLARK-PALMER: When you get to a  
7           good breaking point, the food is here.

8                               MR. CROSS: Okay. Cool. We're  
9           almost there.

10           BY MR. CROSS:

11                   Q           To the best of the firm's knowledge,  
12           the work that was done in Coffee County was done  
13           according to standard policies and practices, and  
14           you would not expect to have left any trace of that  
15           work on the local equipment and devices?

16                   A           Correct. Yes, sir.

17                   Q           Okay. And as you sit here, based on  
18           any information available, do you know -- have you  
19           learned anything that would lead you to believe  
20           that the team somehow inadvertently or  
21           intentionally did leave traces behind?

22                   A           No.

1 back.

2 A Sure.

3 Q In the ordinary course of work for  
4 SullivanStrickler, you have your own devices you  
5 bring in to do a forensic collection?

6 A Correct.

7 Q And that includes a variety of  
8 different types of devices, like hard drives, thumb  
9 drives, right?

10 A Yes.

11 Q Okay. It also includes things like  
12 laptops?

13 A Correct.

14 Q Is there any standard or practice at  
15 SullivanStrickler to routinely test all of that  
16 equipment to determine whether that equipment has  
17 been compromised in some way, like, for example, by  
18 malware?

19 A Yes, but not every device, because  
20 not every device needs it. So I guess the ones  
21 that technically would require it, would fall under  
22 that guide, but . . .

1 Q How often is that sort of testing  
2 done on any device that you would use in the course  
3 of your work?

4 A I don't know.

5 Q And you said some device doesn't --  
6 some devices don't need that. Why would some  
7 devices not need that?

8 A Well, I'm thinking about hardware  
9 devices used for forensic imaging where it's a  
10 device that you put between source and target that  
11 just moves and copies data.

12 Q And it's your understanding that type  
13 of device, for example, it just couldn't store  
14 malware on it?

15 A Correct.

16 Q I see.

17 And what type -- give me an example  
18 of that kind of device. Is there some sort of --

19 A It's been a while. I -- FTK, one of  
20 the -- no, not FTK. The -- I don't know. I'll  
21 have to get back to you, but it'll come to me.

22 Q Okay. We're almost --

1           because otherwise it's going to throw -- it gets  
2           complicated on Exhibit Share. So just remind me at  
3           the end to mark this as an exhibit. We won't do it  
4           for now.

5           BY MR. CROSS:

6                   Q       Okay. So the check came for the  
7           Sidney Powell Engagement from Defending the  
8           Republic, Inc. And that's for the Coffee County  
9           work?

10                  A       Yes.

11                  Q       And do you know anything about that  
12           organization?

13                  A       I do not.

14                  Q       Okay. Let's see. Oh, was anybody  
15           able to identify the person who came in who was  
16           with Scott Hall on-site?

17                  A       No.

18                  Q       Did that person do anything on-site?

19                  A       Not as far as collections, no.

20                  Q       What did he do?

21                  A       As we understand it, he was with  
22           Scott Hall as a programmer.

1 Q And when you say "programmer," what  
2 do you mean?

3 A That's all I know.

4 Q Somebody who would program software  
5 or computers?

6 A Yes.

7 Q Okay. Did he have a computer or  
8 devices with him?

9 A I don't know.

10 Q Okay. Did he offer any direction or  
11 guidance to the SullivanStrickler team on what to  
12 do?

13 A He did not.

14 Q Okay. He was just there with Scott  
15 Hall --

16 A That's correct.

17 Q -- as a programmer?

18 A Correct.

19 Q Okay. Did anyone who was there that  
20 day on-site, to the knowledge of the firm or the  
21 team, take anything with them that they did not  
22 bring in themselves apart from data that was

1 (Felicetti Deposition Exhibit Number 17  
2 marked for identification.)

3 BY MR. CROSS:

4 Q And Exhibit 17 is another document  
5 that was produced to us in response to the Maggio  
6 subpoena.

7 Have you seen this before?

8 A Yes, I have.

9 Q What is this?

10 A This is a representation of the  
11 FileShare activity.

12 Q So --

13 A ShareFile, sorry, to be clear.

14 Q I often make the same mistake.

15 So if we look at Exhibit 17, and just  
16 take the first page, "Item Name," is that a  
17 particular file that's sitting on the ShareFile?

18 A It is.

19 Q Okay. And then there's a date and a  
20 time, right?

21 A Yes.

22 Q And then next to that is, "Activity."



1 If we look at the first line, that's "Download,"  
2 right?

3 A Correct.

4 Q So do I understand that what this  
5 shows is that the user indicated here downloaded  
6 whatever item is listed there at that date and  
7 time?

8 A Yes.

9 Q And the user on that first line is,  
10 "Conan H," Conan Hayes?

11 A Yes.

12 Q And then it's got his e-mail address,  
13 his company, ASOG, A-S-O-G. Then the IP address,  
14 that would be the user's IP address?

15 A Yes.

16 Q And are you familiar with the company  
17 ASOG?

18 A I am not.

19 Q And if you come to the page ending in  
20 141, you'll see -- if you come down, do you see how  
21 the -- under the location, there's Florida,  
22 Virginia, Florida, and then we get to Milan

1 Lombardia. Do you see that?

2 A Yes.

3 Q And that corresponds to downloads by  
4 Conan Hayes on January 13 of 2021. Do you see  
5 that?

6 A Yes.

7 Q And then go to the page ending in  
8 50 -- 150.

9 A Excuse me, real quick. You said  
10 2020 -- oh, I'm sorry. Okay. Never mind.

11 Q Yeah.

12 A And you want me to go to where?

13 Q 150.

14 A Okay.

15 Q And here we have -- you'll see Doug  
16 Logan has some downloads, indicates in Florida,  
17 then there's New Jersey. And then we get to  
18 Florence, Toscana for Scott T on January 9, 2021.

19 Do you see that?

20 A Yes, sir.

21 Q And that -- that, again, indicates  
22 the location that was captured in the system for

1 where the person was when they did the download?

2 A Not necessarily.

3 Q And -- and the question I was going  
4 to ask is: If someone were downloading information  
5 through a VPN, for example, it may not capture  
6 their actual physical location?

7 A Correct.

8 Q And so if, for example, someone  
9 wanted to mask the physical location of where they  
10 were and their IP address, there are ways for them  
11 to do that such as the VPN?

12 A Yes.

13 Q So when -- when we look at this,  
14 Exhibit 17, the IP address and the physical  
15 location may or may not be the actual IP address  
16 and actual physical location of the individual when  
17 they did whatever they did?

18 A Yes.

19 Q And under "User," that indicates the  
20 user log-in credentials for that activity, right?

21 A The user name created, yes.

22 Q Right.

1 But the firm doesn't have any way of  
2 knowing whether the log-in credentials that are  
3 used for any action, whether that was actually by  
4 the person who was assigned those credentials,  
5 right?

6 A Correct.

7 Q And do I understand the redactions in  
8 here are for data that was not from Coffee County?

9 A I would assume so, yes.

10 Q Okay.

11 A But I don't know specifically.

12 Q Okay. Oh, data collection.

13 So it looks like, in going through  
14 this, the latest date for any action is February 26  
15 of 2021. Do you know why the log only goes through  
16 February 26 of 2021?

17 A I do not know.

18 MR. CROSS: Okay. If there are  
19 additional logs, we would ask for production of  
20 those, because our understanding is that the data  
21 sat on that ShareFile longer. In fact, I think  
22 Benjamin Cotton testified that he didn't access

1 Excel file, right?

2 A Yes.

3 Q If you turn to 21, my understanding  
4 is this -- the way the documents were produced,  
5 Exhibit 21 is the attachment to that message?

6 A Yes.

7 Q Do you recognize Exhibit 21? Do you  
8 know what that is?

9 A I do.

10 Q And what is that?

11 A This is a chain-of-custody log, a  
12 tracking log.

13 Q Explain to me -- we talked before why  
14 it's important. Can you just sort of walk me  
15 through the fields and what they show? You can  
16 just pick one of the rows.

17 A Sure. So the photos that we looked  
18 at previously, this is a spreadsheet representation  
19 of what was tagged and labeled, et cetera. So if  
20 I'm looking at 20 -- 205, this guy --

21 Q Uh-huh.

22 A -- the first column representing the

1 identified was CS, CompactFlash, the flash drives,  
2 b represented the label, and C represented whether  
3 it was primary or secondary based on the labels in  
4 the photos.

5 Q What is primary versus secondary?

6 A I don't know. I don't know if  
7 they're duplicative. I don't know, but that's how  
8 they were handed to us and labeled.

9 Q So the primary and secondary  
10 designation, that comes from Coffee County, that's  
11 not your terminology?

12 A Correct.

13 Q I see.

14 A Correct.

15 Q Okay. So grab Exhibit 12, if you  
16 would, it's the photos --

17 A Sure.

18 Q -- that Jennifer Jackson took. And  
19 if you look at -- look at these together.

20 A Sure.

21 Q The photo that ends in 236.

22 A Yes.

1 Q The first one is CF01, and then it  
2 says "BTown-1." Do you see that?

3 A Yes, sir.

4 Q And so that would correspond to the  
5 first row in Exhibit 21, right?

6 A Yes.

7 Q And then the next one in the picture  
8 at 236, is CF02 BTown-2, and that corresponds to  
9 the second row in 21?

10 A Yes.

11 Q Okay. So if for some reason someone  
12 thought it would be really fun to do, and I will  
13 leave it to someone on my team, someone could go  
14 through the photos using these notes and match  
15 those up to the chain-of-custody log, right?

16 A Yes.

17 Q Okay.

18 (Felicetti Deposition Exhibit Number 22  
19 marked for identification.)

20 BY MR. CROSS:

21 Q All right. Exhibit 22. So  
22 Exhibit 22 at the top is an e-mail from Jim Penrose

1 A Sure.

2 Q The SullivanStrickler team went in  
3 and scanned -- or sorry, copied thumb drives and it  
4 copied whatever data was on those thumb drives at  
5 the moment the team came in to copy them?

6 A Correct.

7 Q At the same time in parallel, Misty  
8 Hampton is scanning cast ballots with a scanner?

9 A Yes.

10 Q Do you know whether -- the scans that  
11 Misty Hampton created, whether those scans were  
12 also at some point provided to SullivanStrickler?

13 A Yes, they were put on a thumb drive  
14 for us to scan -- to forensically image.

15 Q Okay. Got it. Got it.

16 And was that done on the 7th or  
17 later?

18 A No, the same day. So the 7th.

19 Q Do you know what elections she was  
20 scanning ballots from?

21 A I don't know.

22 Q Okay. Did the team see anyone other



1           than Ms. Hampton scan ballots?

2                   A       Based on my discussion with the team,  
3           it was Misty. That's it.

4                   Q       So we've talked about a number of  
5           folks, and we looked at pictures outside the  
6           building. Let me just make sure I get a complete  
7           picture of the inside.

8                               So in the office during the day while  
9           SullivanStrickler was doing its work, it was  
10          obviously the four members of the SullivanStrickler  
11          team?

12                   A       Yes.

13                   Q       Cathy Latham was there for most of  
14          the day. Is that right?

15                   A       Yes.

16                   Q       And I think you said earlier she was  
17          helping provide some direction on what to copy?

18                   A       Yes.

19                   Q       Misty Hampton was there for most of  
20          the day, also providing some direction?

21                   A       Yes.

22                   Q       Scott Hall was there for most of the

## 1 CERTIFICATE OF NOTARY PUBLIC

2 I, FELICIA A. NEWLAND, CSR, the officer before whom  
3 the foregoing videotaped deposition was taken, do  
4 hereby certify that the witness whose testimony  
5 appears in the foregoing deposition was duly sworn  
6 by me; that the testimony of said witness was taken  
7 by me in stenotype and thereafter reduced to  
8 typewriting under my direction; that said deposition  
9 is a true record of the testimony given by said  
10 witness; that I am neither counsel for, related to,  
11 nor employed by any of the parties to the action in  
12 which this deposition was taken; and, further, that  
13 I am not a relative or employee of any counsel or  
14 attorney employed by the parties hereto, nor  
15 financially or otherwise interested in the outcome  
16 of this action.

17  
18   
19

20 FELICIA A. NEWLAND, CSR

Notary Public

21 My commission expires:

22 September 15, 2024